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Issue
Brief



Global



Tobacco Harm Reduction: The Industry's Latest Trojan Horse?

January 2024

Given the lethal nature of the products it sells, the tobacco industry has always depended on recruiting new consumers, primarily children and young adults.

Historically, it has targeted these groups with cigarettes, and is now doing the same with [newer nicotine and tobacco products](#).^{1,2,3,4}

At the tenth Conference of the Parties (COP10) to the [World Health Organization Framework Convention on Tobacco Control](#) (WHO FCTC), newer nicotine products are again on the agenda. Using the concept of [tobacco harm reduction](#) (THR), the industry and its allies argue that these products can help smokers quit and should not be subject to the kind of tobacco control regulations that WHO recommends for cigarettes and other conventional tobacco products.

However, public health experts have serious concerns about uptake of these products amongst those who have never smoked, especially young people.

Background

The WHO FCTC is an international treaty that aims to reduce the supply and demand of tobacco. Every two years, a Conference of the Parties (COP) is held, at which the Parties to the treaty meet to discuss implementation and work out how to further advance global tobacco control.

Though the tobacco industry is barred from participating in the COP, that hasn't stopped it from attempting to undermine the treaty.⁷ While the industry has employed a range of strategies, it continues to depend heavily on a tactic it has used successfully for decades: the use of third-party organizations.⁸ Through supporting these groups, the industry attempts to influence national delegations to the COP,⁹ control the media narrative (including on social media)¹⁰ and ensure that its voice is heard even if it is not physically present.¹¹

Today, much third-party activity concerns newer nicotine and tobacco products such as [e-cigarettes](#), [heated tobacco products](#) (HTPs) and [nicotine pouches](#). So much so, that in 2019 WHO warned that these products "are creating another layer of interference by the tobacco industry and related industries, which is still reported by Parties as the most serious barrier to progress in implementing the WHO FCTC."¹²

Why the Industry Is Barred From Participating in COP

The tobacco industry identified the WHO FCTC as an existential threat long before the treaty came into force in 2005.⁵ A 1997 analysis of the treaty process, produced by a U.S. consultancy group for the tobacco giant [Philip Morris International](#) (PMI), characterized WHO's position as uncompromising.⁶

This assessment reflects the irreconcilable conflict between the interests of the tobacco industry and public health. This is one of the guiding principles of Article 5.3 of the WHO FCTC, which urges parties to protect public health policymaking from the vested interests of the tobacco industry. The aim is to deny the industry a seat at the table, and as such, its representatives are barred from the COP.

Tobacco harm reduction is a complex issue

Worldwide, there are dozens—perhaps hundreds—of civil society organizations campaigning around newer nicotine products. While some are clearly funded by the tobacco industry, in many other cases it is hard to know one way or the other, resulting in a complex scenario which helps to conceal industry influence and increase exposure to its messaging.¹³

Many of these groups are promoting the use of these products and argue against the application of the kind of tobacco control measures found within the WHO FCTC.^{14,15}

Their reasoning usually rests on the concept of tobacco harm reduction (THR). This is the belief that these newer products provide the user with the nicotine they desire, but generate fewer of the dangerous toxins found in cigarette smoke. THR advocates suggest that smokers who are unwilling or unable to quit nicotine entirely should therefore be encouraged to switch to these products—often described as “safer,” “less harmful” or “reduced risk.”¹⁶

Some public health experts—particularly those working in high-income countries, where the major tobacco control policies have mostly been implemented—support a similar

position. This typically outlines a role for e-cigarettes, which, according to research by Cochrane, have been shown to help smokers quit,^{17,18} but within an appropriately regulated environment and as part of a comprehensive set of tobacco control measures.

Nonetheless, many in the public health community, including WHO, continue to urge caution regarding newer nicotine products, given the difficulties in creating and implementing effective regulation, particularly in certain jurisdictions; ongoing tobacco industry interference, including its misuse of THR; and remaining uncertainty about the long-term health risks when considering the population as a whole.^{26,27,28}

Industry Misappropriation of Harm Reduction

The tobacco industry has misappropriated the broader concept of tobacco harm reduction, using it to undermine existing tobacco control regulations¹⁹; sow division amongst the public health community²⁰; and promote products such as HTPs, which have not been shown to assist quitting and where much less is known about their risks.^{21,22}

Perhaps most importantly, the tobacco industry has used the concept of tobacco harm reduction to spread the misleading narrative that it has changed. Long recognized as the cause of the tobacco epidemic, the industry is now attempting to portray itself as part of the solution and is pushing to be included in policy discussions on public health and tobacco control—including at the COP.^{23,24}

This industry-driven argument has gained traction with some policymakers and has the potential to erode the political consensus which has been central to the success of the global tobacco control movement in recent decades.²⁵

There is major concern about uptake of these products amongst those who have never smoked, especially young people. In England, for instance, the number of young e-cigarette users has tripled in the last three years,²⁹ while, worryingly, recent evidence from Ireland suggests that use of e-cigarettes amongst teenagers increased their risk of cigarette smoking.³⁰

This complexity and countries' differences in regulatory capacity have led to vastly different approaches to newer nicotine products across the world. In the U.K. and across much of the EU, e-cigarettes and HTPs are freely sold as consumer goods, while elsewhere, including in large markets such as Mexico and India, they have been banned completely.^{31,32} In Australia, while HTPs are currently prohibited,³³ e-cigarettes are available, but only with a medical prescription.³⁴

At COP10, these products are once again on the agenda—and for the industry and its allies, tobacco harm reduction has become the Trojan Horse with which they hope to influence the negotiations in their favor.

An "industry-funded scientific lobby group" works to undermine tobacco control

With global smoking rates declining in recent decades, the industry has quietly been building a global network of third-party organizations to make the case for tobacco harm reduction, thus camouflaging its own messaging as independent scientific research or as grassroots consumer activism.^{41,42,43}

One key conduit for industry funding has been the [Foundation for a Smoke-Free World](#) (FSFW). Though it claims to be an "independent, non-profit organization" and to be "free from the control or influence of any third party," FSFW was established by PMI in 2017 and, as of late 2023, PMI remained its sole funder.^{44,45} Though it terminated its funding agreement with FSFW in 2023, PMI left it with a massive lump sum of US \$122.5 million—enough to fund the Foundation for another seven years on its current annual budget.⁴⁶ In total, PMI has provided more than US \$400 million in funding to FSFW.⁴⁷

Experts from the Tobacco Control Research Group at the University of Bath have called FSFW an "industry-funded scientific lobby group."⁴⁸ Drawing a parallel with historical industry-backed scientific front groups, they argue that FSFW aims to sow doubt and ignorance about the harms of the tobacco industry's products, promote consumption

of such products as part of the solution to the tobacco epidemic and legitimize the role of the industry in the creation and use of scientific knowledge.⁴⁹

In other words, the Foundation is just the latest vehicle for a decades-old disinformation campaign.

Why the Industry Uses Allies to Promote its Priorities

Ever since the link between smoking and cancer was established in the 1950s, the tobacco industry has recognized that it has a serious credibility problem amongst both policymakers and the public.

To overcome this, it has funded and empowered a wide range of [third parties](#) and [front groups](#) to speak on its behalf, thus disguising industry discourse as that of more respectable individuals or groups. These have often been medical professionals, scientists or other "independent" researchers, hired to produce misleading scientific research and fired if their conclusions failed to support tobacco industry positions.^{35,36}

Throughout the second half of the 20th century, this tactic allowed the industry to systematically sow doubt and confusion around the lethal nature of the product it sells—from denying that smoking causes cancer, to downplaying the dangers of second-hand smoke, to refuting the notion that nicotine is addictive.^{37,38} This calculated disinformation strategy, which was exposed by the publication of internal industry documents in the 1990s, delayed the introduction of measures which have since helped reduce tobacco use and save lives.^{39,40}

FSFW and its grantees' attempts to influence the COP

FSFW has distributed millions of dollars' worth of grants in 46 countries around the world.⁵⁰ One major grantee is [Knowledge-Action-Change](#) (K-A-C), a U.K.-based organization which focuses on "harm reduction as a key public health strategy."⁵¹ FSFW has provided K-A-C with more than £5.7 million (about US \$7.2 million) in funding since 2017, with another £4.5 million (about US \$5.7 million) having been pledged.⁵²

This funding provides scholarships for tobacco harm reduction advocates, as well as the Global State of Tobacco Harm Reduction (GSTHR), a digital resource that maps the availability and use of newer nicotine and tobacco products and global regulatory responses to them.⁵³ Recent investigative reporting detailed the activities of some scholarship recipients in Latin America, including addressing a congressional hearing without disclosing industry-linked funding.⁵⁴

K-A-C has also been a vocal critic of WHO and the COP; in October 2023 a GSTHR briefing was published that laid out "the principal threats to THR [tobacco harm reduction] and consumer access to SNP [safer nicotine products]" posed by the COP10 agenda.⁵⁵

FSFW also funded third-party organizations to promote tobacco harm reduction ahead of COP9 in 2021. Analysis of FSFW's 2020 tax return shows it awarded grants "to garner consensus and support for COP9 to consider harm reduction as integral to tobacco control" to three organizations: the Switzerland-based [International Network of Nicotine Consumer Organisations](#) (INNCO), the Argentine [Asociación Argentina de Servicios Médicos de Avanzada](#) and the [Alternative Research Initiative](#) in Pakistan.⁵⁶

The industry links of "grassroots" organizations

As well as funding scientists and researchers, the industry has also poured funding into what might appear

to be grassroots consumer organizations, such as INNCO and the [World Vapers' Alliance](#) (WVA).

Their discourse often has a populist tone, with tobacco harm reduction framed as a struggle of the common man against fussy bureaucrats and overzealous public health experts. WVA's stated mission is "to connect passionate vapers around the world and empower them to make a difference for their communities."⁵⁷ Drawing on the imagery of popular social movements, the WVA logo is a clenched fist holding an e-cigarette.

In fact, WVA was established in 2020 by the [Consumer Choice Center](#) (CCC), a U.S. lobbying organization that has received funding from some of the world's biggest tobacco companies, including PMI, [Japan Tobacco International](#) (JTI), [Altria](#) and [British American Tobacco](#) (BAT). As of late 2023, the WVA website continued to acknowledge funding from CCC.⁵⁸

In turn, CCC was set up by Students for Liberty (SFL), a U.S. libertarian organization with links to the Koch brothers, American billionaire industrialists who, since the 1970s, have assembled a network of conservative thinktanks and lobby groups dedicated to fighting government regulation of business.⁵⁹ According to Greenpeace, this involved pouring over US \$145 million into climate denial front groups between 1997 and 2018.⁶⁰ Several senior WVA personnel used to work for SFL, according to their LinkedIn profiles.^{61,62,63}

According to an investigation published by The Daily Beast in 2022, internal sources and leaked documents also show that BAT had had a "central and hands-on role in orchestrating, directing, and funding the World Vapers' Alliance."⁶⁴

Though a statement published on the CCC website denied these allegations, in 2023 *The Times* reported that senior employees at Red Flag Consulting, an Irish PR firm hired to work with WVA, would report back to BAT executives on the progress of WVA campaigns and their potential for impact on EU legislators.⁶⁵

According to the source quoted in *The Times*, BAT used WVA because “nobody’s going to listen to a tobacco company” arguing against the regulation of its products.⁶⁶ Like some of the groups financed by FSFW, both CCC and WVA have been openly critical of WHO and active in lobbying ahead of sessions of the COP.^{67,68,69,70}

Consumer groups target the COP

Other consumer organizations that have targeted the COP sometimes provide little information regarding either their founders or funders.

Take COPWATCH, for example. An influential website that publishes regular blog posts attacking WHO, the COP and the tobacco control community, it does not identify the authors of the posts or any of its funders. The “About Us” section of their website states only that the website “is written and published by consumers of safer nicotine products.”⁷¹

Where organizations expressly disavow tobacco funding, it is difficult to ascertain whether such assertions hold up, given that the funding sources claimed often remain obscure.

For instance, the U.K.-based New Nicotine Alliance (NNA) states on its website:

“The NNA(UK) is funded by donations from private individuals and organisations. We do not accept donations from the tobacco industry, the electronic cigarette industry or manufacturers/distributors of other nicotine products. Our independence from commercial conflicts of interest is of paramount importance.”⁷²

Similarly, the Coalition of Asia Pacific Tobacco Harm Reduction Advocates (CAPHRA), a New Zealand-based umbrella organization, states that it is “unfunded and grassroots.”⁷³ Nancy Loucas, CAPHRA founder and executive coordinator, has strongly rejected any suggestion of tobacco industry links.⁷⁴

However, while indeed there is no evidence to suggest that either the NNA or CAPHRA accept funding from the tobacco or vaping industries, both organizations have recent associations with other actors who do have demonstrable industry connections.

The NNA, for example, was a founding member of INNCO, which was funded by PMI’s FSFW from 2018 until March 2023.^{75,76} [Gerry Stimson](#), founder and director of FSFW grantee K-A-C, was on the board of NNA until 2019.⁷⁷

In September 2023, CAPHRA’s Nancy Loucas appeared at the [Global Tobacco and Nicotine Forum](#),⁷⁸ an event sponsored by major tobacco companies including Altria, PMI, BAT and [Imperial Brands](#), as well as various vaping retailers and manufacturers.⁷⁹ CAPHRA has also collaborated with [Factasia](#), a THR-focused organization based in Hong Kong, which has been funded by PMI.^{80,81}

Both the NNA and CAPHRA have been active in advance of COP10.

In March 2023, the NNA published a “call to action” entitled “The World Health Organization is planning a global assault on vaping.” It urged its supporters to write to their MP and to the FCTC focal point in the U.K., to “insist the U.K. stands up for vaping and other non-combustible nicotine alternatives to smoking,” in the face of “blind, unscientific, and ideological hostility from the WHO.”⁸²

The same month, CAPHRA had its partner organizations send an open letter to their respective countries’ delegations to the COP requesting that at least one consumer of “safer nicotine products” be included in the groups traveling to the conference.⁸³

Critics argue that the call for consumer inclusion on COP delegations is an attempt to ensure that tobacco industry arguments are heard during the treaty negotiations.⁸⁴

Hooking a New Generation to Protect its Business

With new companies, products and civil society organizations emerging all the time, the whole scenario around tobacco harm reduction can feel impenetrable. But of one thing we may be sure: the tobacco industry's commitment to harm reduction is bogus.

This is not only because of the six trillion cigarettes the industry continues to manufacture every year,⁸⁵ and its continued opposition to tobacco control regulation, but because a business model based purely on marketing newer nicotine products to existing smokers is inherently unsustainable.^{86,87,88} Some of these people would continue to smoke cigarettes. Others might successfully switch to newer products, while others might quit nicotine altogether. But all will eventually age and die, with two out of three long-term smokers dying prematurely from tobacco-related diseases.⁸⁹

The tobacco industry therefore depends on recruiting new consumers of its products. And with strong evidence that tobacco use generally starts in a narrow age window spanning adolescence and young adulthood—a 2019 study put the mean age of initiation for regular tobacco smoking at 19.2 years⁹⁰—that means attracting children and young adults. The same principle applies to newer nicotine and tobacco products.

The targeting of this demographic is clear from how these products are being marketed, with dazzling colors, sweet flavors and even e-cigarettes designed to resemble cans of soda (complete with a bendy straw through which the aerosol is inhaled), or miniature toys.⁹¹

BAT's own research suggests that at least half of those using its [Vype e-cigarette](#) and Velo and Lyft nicotine pouches had never previously smoked,⁹² while in December 2023 WHO highlighted that e-cigarette use amongst children aged 13 to 15 exceeded adult use across all WHO regions.⁹³

This is why many public health experts are now warning that a whole new generation—one which was largely tobacco free—is now becoming addicted to nicotine.^{94,95}

Conclusion

The emergence of newer nicotine products, at a time when global smoking rates were in decline, has been a potential lifeline for the tobacco industry. Having invested billions of dollars in research, development and marketing of these products, the industry remains determined to fight any regulation that could reduce demand—particularly in countries where strong tobacco control regulations limit its ability to sell cigarettes.

It is no surprise, then, that the tobacco industry continues to target the COP, bankrolling third parties all over the world to ensure its voice is heard. This is a reprise of the same strategy that helped it become one of the most profitable industries of the 20th century, even after the deadly nature of its products became public knowledge.

The products may be new, but industry tactics remain the same.

What can governments do?

To protect youth and prevent the industry from influencing health policy, governments should:

- Put in place processes and procedures to minimize interactions with the industry and its allies, across the whole of government, in line with Article 5.3 of the WHO FCTC.
- Record and publish details of any interactions with the tobacco industry or groups making representations on its behalf.
- Reject industry attempts to influence policy.
- When approached by a new group, determine whether it has industry links. This information may be found by looking at information about its funders and partners on its website, if provided; searching for organizations or individuals on [Tobacco Tactics](#); or checking [STOP's Industry Allies database](#).
- Groups identified as being funded by or linked to the industry should be treated as part of the industry. Groups that are aligned with industry interests should also be treated with caution.

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About STOP (Stopping Tobacco Organizations and Products)

STOP is a global tobacco industry watchdog whose mission is to expose the tobacco industry tactics that undermine public health. Comprised of a network of academic and public health organizations, STOP researches and monitors the tobacco industry, shares intelligence to counter its tactics, and exposes its misdeeds to a global audience. STOP is funded by Bloomberg Philanthropies as part of the [Bloomberg Initiative to Reduce Tobacco Use](#). For more information, visit [exposetobacco.org](https://www.exposetobacco.org).